

COMMONWEALTH OF MASSACHUSETTS

ESSEX, SS

TRIAL COURT DIVISION
ESSEX SUPERIOR COURT
CIVIL ACTION #: 1577CV01902A

EUGENE PELIKOV
Plaintiff,

vs.

GOLD AND FARB, INC., LEV GOLDFARB,
ALEXANDER GOLDFARB AND
LYDMILA ROGALIN
Defendants.

DEFENDANTS' NOTICE OF INTENT TO FILE MOTION


NOW COME the Defendants, Gold and Farb, Inc., Lev Goldfarb, Alexander Goldfarb
and Lydmila Rogalin and hereby provide notice of their intent to file a Motion to Extend Time to
Respond to Discovery pursuant to Rule 9A of the Massachusetts Rules of Civil Procedure.

GOLD AND FARB, INC., LEV GOLDFARB,
ALEXANDER GOLDFARB AND
LYDMILA ROGALIN
By his attorney:



Vladimir von Timroth, Esq., BBO #643553
LAW OFFICE OF VLADIMIR VON TIMROTH
405 Grove Street, Suite 204
Worcester, MA 01605
(508) 753 2006 phone
(774) 221 9146 fax
vontimroth@gmail.com

Dated: April 13, 2016

A TRUE COPY. ATTEST

DEPUTY ASS'T. CLERK

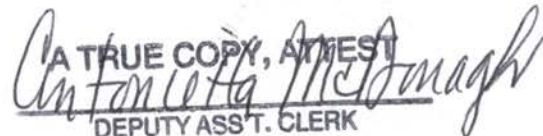
CERTIFICATE OF SERVICE

I, Vladimir von Timroth, do hereby certify that I provided a copy of the within DEFENDANTS' NOTICE OF INTENT TO FILE MOTION by first class mail, postage prepaid this 13th day of April, 2016 to the parties below:



Vladimir von Timroth, Esq. BBO#643553

Eugene Pelikhov
c/o Matthew Shayefar, Esq.
Valentin David Gurvits, Esq.
Boston Law Group, PC
825 Beacon St., Suite 20
Newton Centre, MA 02459

A TRUE COPY, ATTEST

DEPUTY ASS'T. CLERK

VLADIMIR VON TIMROTH, ESQ.

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Worcester, MA 01605

Telephone (508) 753 2006

Facsimile (774) 221 9146

April 13, 2016

Essex County Superior Court
Clerk's Office
56 Federal Street
Salem, MA 01970

Re: Eugene Pelikov vs. Gold and Farb, Inc. et. al.
Civil action #: 1577CV01902

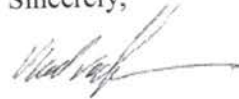
Dear Sir/Madam:

Please find enclosed herewith the following documents with regard to the above-referenced matter:

- DEFENDANTS' NOTICE OF INTENT TO FILE MOTION.

Thank you for attention to this matter.

Sincerely,



Vladimir von Timroth

Encl.

Cc: Matthew Shayefar, Esq.
Valentin David Gurvits, Esq.

A TRUE COPY, ATTEST

DEPUTY ASS'T. CLERK